

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SOLAS OLED LTD.,

Plaintiff,

vs.

LG DISPLAY CO., LTD.,
LG ELECTRONICS, INC., and
SONY CORPORATION,

Defendants.

Case No. 6:19-cv-00236-ADA

JURY DEMANDED

DECLARATION OF NEIL A. RUBIN IN SUPPORT OF SOLAS' OPENING CLAIM
CONSTRUCTION BRIEF

I, Neil A. Rubin, state as follows:

I am a member of the State Bar of California and an attorney at the law firm of Russ August & Kabat, counsel for Plaintiff Solas OLED LTD. (“Solas OLED”) in the above-captioned actions. I have personal knowledge of the facts set forth in this declaration, and, if called upon to testify, could and would testify competently thereto.

1. Attached as **Exhibit 1** is a true and correct copy of the Declaration of Richard A. Flasck in support of Solas OLED’s Opening Claim Construction Brief.

2. Attached as **Exhibit 2** is a true and correct copy of U.S. Patent No. 7,907,137

3. Attached as **Exhibit 3** is a true and correct copy of U.S. Patent No. 7,432,891

4. Attached as **Exhibit 4** is a true and correct copy of U.S. Patent No. 7,573,068

5. Attached as **Exhibit 5** is a true and correct copy of Parties’ Joint Revised List of Terms/Constructions dated March 6, 2020

6. Attached as **Exhibit 6** is a true and correct copy of Microsoft Computer Dictionary (3rd ed., 1997), definition of “signal”

7. Attached as **Exhibit 7** is a true and correct copy of McGraw-Hill Dictionary of Scientific and Technical Terms (4th ed., 1989), definition of “data transmission line”

8. Attached as **Exhibit 8** is a true and correct copy of Merriam-Webster Dictionary (avail. at www.merriam-webster.com, accessed Feb 2020), definitions of “along” and “together”

9. Attached as **Exhibit 9** is a true and correct copy of Dictionary.com (avail. at www.dictionary.com, accessed Feb. 2020), definitions of “along” and “together”

10. Attached as **Exhibit 10** is a true and correct copy of Defendant LG Display’s petition for *inter partes* review in IPR2020-00177 on the ‘891 patent

11. Attached as **Exhibit 11** is a true and correct copy of Defendant LG Display’s expert declaration by Dr. Hatalis in *inter partes* review in IPR2020-00177 on the ‘891 patent

12. Attached as **Exhibit 12** is a true and correct copy of U.S. Patent No. 5,106,652

13. Attached as **Exhibit 13** is a true and correct copy of U.S. Patent No. 5,981,317

14. Attached as **Exhibit 14** is a true and correct copy of U.S. Patent Appl. Pub. No. 2002/0101172

15. Attached as **Exhibit 15** is a true and correct copy of U.S. Patent No. 7,250,722

I declare under penalty of perjury that the foregoing is true and correct.

Executed March 13, 2020, at Los Angeles, California.

/s/ Neil A. Rubin
Neil A. Rubin

CERTIFICATE OF SERVICE

The undersigned certifies that on March 13, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3)(A).

/s/ Reza Mirzaie
Reza Mirzaie